

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. NO. 04-CV-10521-GAO

BETTY ANNE WATERS, as Administratrix of the
Estate of KENNETH WATERS,

Plaintiff

v.

TOWN OF AYER, NANCY TAYLOR-HARRIS,
in Her Individual Capacity, ARTHUR BOISSEAU,
In His Individual Capacity, BUDDY DECOT, In
His Individual Capacity, WILLIAM ADAMSON,
in His Individual Capacity, PHILIP L. CONNORS,
in His Individual Capacity, and JOHN DOE and
JANE DOES 1-16, in Their Individual Capacities,

Defendants

PROPOSED JOINT SCHEDULING
STATEMENT

Now come the parties in the above-referenced action and hereby submit the following Joint Statement pursuant to Local Rule 16.1(D):

I. PROPOSED DISCOVERY PLAN

The parties propose the following discovery plan:

- a. Rule 26(a)(1) disclosures by February 28, 2005 in accordance with L.R. 26.2(A);
- b. Motions to amend or supplement pleadings or to add parties by June 1, 2005;
- c. Fact discovery to be concluded by December 2, 2005;
- d. Plaintiffs' expert disclosures by February 1, 2006;
- e. Defendants' expert disclosures by March 1, 2006;
- f. Expert depositions by March 31, 2006.

II. MOTION SCHEDULE

All dispositive motions will be served no later than June 2, 2006 with responses due by July 3, 2006 and replies due by July 17, 2006. Discovery motions, to the extent that they are

necessary, will be filed prior to the close of discovery. Trial motions are to be served not less than seven (7) days prior to trial, except for good cause.

III. TRIAL SCHEDULE

Trial will be tentatively scheduled for September 2006.

IV. TRIAL BY MAGISTRATE JUDGE

The parties do not consent to a trial before a magistrate judge.

V. CERTIFICATIONS

L.R. 16.1 certifications of conferral will be filed separately,

DEFENDANTS,

By their attorney,



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